

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff

v.

HARVEY NEWKIRK,

Defendant

S2 14 Cr. 534 (JSR)

**NOTICE OF MOTION FOR
JUDGMENT OF ACQUITTAL
AND FOR A NEW TRIAL**

Please take notice that, upon the accompanying Memorandum of Law, the Declaration of Priya Chaudhry and annexed exhibit, Defendant shall move the Court before the Honorable Jed S. Rakoff, U.S.D.J., at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, on such day and time as counsel may be heard, for a Court order directing the acquittal of Defendant under Federal Rule of Criminal Procedure 29(c), or in the alternative, directing a new trial under Federal Rule of Criminal Procedure 33.

WHEREFORE, as more fully described in the accompanying Memorandum of Law, the undersigned respectfully requests that the Court order the acquittal of Defendant, or in the alternative, direct a new trial of Defendant.

Dated: New York, New York
January 28, 2016

Respectfully Submitted,

/s/ Priya Chaudhry
Priya Chaudhry
HARRIS, ST. LAURENT &
CHAUDHRY LLP
40 Wall St., 53rd Floor
New York, NY 10005
Phone: (212) 397-3370
Fax: (212) 202-6206
priya@sc-harris.com

Attorney for Defendant